REMARKS

Claims 1-20 are currently pending in the application. Claims 1-20 stand rejected. In order to expedite prosecution, the Applicants amend claims 1, 3-4, 6, 8-9, 13, 15, and 18-20. Claim 2 is cancelled. No new matter was introduced by way of the amendments. The Applicants make no admissions or waives any arguments related to the *Office Action* by making the amendments. The Applicants reserve the right to pursue the unamended claims in a later application.

Claim Rejections – 35 USC § 102

The Examiner rejected claims 1-4 and 13-20 under 35 USC 102(b) as being anticipated by Haitsuka et al. (6,847,992 hereinafter *Haitsuka*).

Regarding claim 1,

The Applicants respectfully submit that *Haitsuka* does not teach a database that "comprises a plurality of hierarchy tables configured to store at least some of the consumer data, each hierarchy table comprising at least one fact associated with at least one dimension" as required by claim 1 as amended.

Haitsuka teaches a client application that enables access to an online service. The client application receives play lists from an online service provider and plays advertisements. When a client clicks on an advertisement, the client application forwards the user's informational data to the advertisement's sponsor (*Haitsuka*, Abstract).

Haitsuka does not teach a database comprising a plurality of hierarchy tables. *Haitsuka* discloses, in particular, that after the first time the user connects to the network "the OSP server 130 preferably requires the user… to submit personal profile information" which is "maintained by the OSP server 130 within a user information record, referred to as a User Record." "The User Record… contains a plurality of data fields that each correspond to … [a] demographic category" (*Haitsuka*, col. 9, lines 66-67

& col. 10, lines 1-11). *Haitsuka* does not disclose that the records are stored in a database. Further, the User Record taught in *Haitsuka* is clearly not a hierarchy table.

The Examiner originally rejected claim 2 (which Applicants are presently cancelling) which states, in part, "wherein each of the plurality of hierarchical tables comprises dimensions and facts" based on col. 18, lines 20-24 of *Haitsuka*. *Haitsuka* col. 18, lines 20-24 states, in part, that "the summary record includes the results of the statistical analysis... including objects associated with text and graphical displays, such as tables and graphs, to assist the sponsor in analyzing the data." The Examiner is apparently stating that the summary record includes a plurality of hierarchical tables.

The Applicants respectfully submit that the summary record disclosed in *Haitsuka* does not teach a plurality of hierarchy tables much less that the plurality of hierarchy tables are within a database as required by the claim. Rather, *Haitsuka* discloses only tables, not a plurality of hierarchy tables, within a summary record. The summary record is a report that is generated based on a result of statistical analysis performed on click-through frequency collected by the OSP server. The summary record "provides the sponsor with a statistical picture related to the users that have performed click-through on any of the sponsor's advertisements" (*Haitsuka*, col. 18, lines 36-39). The summary record does not contain a database or a hierarchy table much less a database comprising a plurality of hierarchy tables as required by the claim.

Further, the Applicants also respectfully submit that *Haitsuka* does not teach "receiving user selected values from a front end, the front end having an interface displaying a selection area with user selectable values that change depending on an initially selected value" as required by the amended claim. The Examiner rejected claim 1, stating that Figure 8, 820, of *Haitsuka* discloses "sponsor define certain criteria so therefore the relevant (value) records change according to the sponsor defined criteria." The Applicants respectfully state that Figure 8 does not teach or disclose a front end or an interface that displays a selection area with user selectable values that change depending on an initially selected value. In fact, *Haitsuka* does not teach an interface or a display of selection areas.

For at least these reasons, the Applicants request that the rejection to claim 1, as well as the rejections to all claims that depend upon claim 1, be withdrawn and the claims allowed.

Regarding Claim 3,

The Examiner rejected claim 3 stating that "Haitsuka further teaches the consumer data further comprise a number of impression of an advertisement (Figure 6, 620)" (Office Action, p. 2). The Applicants respectfully disagree.

The Applicants respectfully submit that *Haitsuka* does not teach that consumer data comprises a number of impressions of an advertisement. *Haitsuka* teaches that "[a]t some point during the online session, the user clicks on or otherwise selects a sponsored advertisement in the client window 200 (step 620). The client application 110 then automatically transmits a notification signal of the OSP server 130 that notifies the OSP server 130 that the user clicked on the advertisement (step 625)" (*Haitsuka*, col. 14, lines 51-56). A notification signal transmitted upon a single click does not teach consumer data comprising a number of impressions of an advertisement as required by the claim.

For at least these reasons, as well as the reasons discussed regarding claim 1, the Applicants request that the rejection to claim 3 be withdrawn and the claim allowed.

Regarding Claims 13-20,

Independent claim 13, of which claims 14-20 depend, claims as amended "wherein the plurality of hierarchy tables are arranged in a hierarchy topology with a lowest level hierarchy table of the plurality of hierarchy tables comprising facts associated with a highest number of dimensions and a highest level hierarchy table of the plurality of hierarchy tables comprising facts associated with a single dimension." As discussed with regard to claim 1, *Haitsuka* does not teach hierarchy tables. Further, *Haitsuka* does not teach a plurality of hierarchy tables arranged in a hierarchy topology.

For at least these reasons, as well as the reasons discussed with regard to claim 1, the Applicants respectfully request that the Examiner withdraw the rejections to claims 13-20, and allow the claims.

Claim Rejections – 35 USC § 103

The Examiner rejected claims 5-12 under 35 USC 103(a) as being unpatentable over *Haitsuka*.

Regarding Claim 5,

For at least the reasons discussed with regard to claim 1 from which claim 5 depends, the Applicants request that the rejection to claim 5 with withdrawn and the claim allowed.

Regarding Claims 6-12,

For at least the reasons discussed with regard to claims 1 and claims 13-20, the Applicants request that the rejections to claims 6-12 be withdrawn and the claims allowed.

The Applicants respectfully request entry of these amendments and new claims as provided herein. The application is believed to be in condition for allowance and a Notice of Allowance is hereby respectfully requested. If the Examiner has any questions or needs any additional information, the Examiner is invited to telephone the undersigned.

The Commissioner is authorized to charge any fee deficiency or credit any overpayment to Deposit Account 50-4561.

Respectfully submitted,

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